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**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

Joseph J. Smith, <i>individually and on behalf of all others similarly situated</i> ,  Plaintiff,  v.  One Nevada Credit Union,  Defendant.	Case No.: 2:16-cv-02156-GMN-NJK  <b>Motion for Leave to File Supplemental Authorities in support of Plaintiff's Opposition to Defendant's Motion to Stay Discovery [ECF No. 27]</b>
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Pursuant to LR 7-2(g), Plaintiff Joseph J. Smith ("Plaintiff") respectfully requests leave to file supplemental authorities in support of his opposition to Defendant One Nevada Credit Union's ("Defendant") Motion to Stay Discovery. ECF Nos. 25, 27. Plaintiff seeks to supplement the record with this Court's order denying a motion to stay discovery in *Maldonado v. HSBC Mortgage Services, Inc.*,

1 No. 2:16-cv-784-JAD-VCF (D. Nev. Jan. 10, 2017), attached hereto as **Exhibit A**,  
2 issued by this Court after Plaintiff's opposition, ECF No. 27, had been filed.

3 Under LR 7-2(g), good cause exists for Plaintiff to supplement the record  
4 with *Maldonado* since that case was issued after Plaintiff filed his opposition and  
5 involves many of the same issues in this case. In particular, *Maldonado* denied a  
6 motion to stay discovery pending a ruling on a motion to dismiss an FCRA claim  
7 based on the defendant's access of the plaintiff's consumer report without a  
8 permissible purpose. The defendant argued that the plaintiff lacked Article III  
9 standing after *Spokeo*. See Motion and Reply, attached hereto as **Exhibits B, D**.  
10 The plaintiff argued that he had sufficiently alleged an injury-in-fact—an invasion  
11 of his privacy, among other things. See Opposition, attached hereto as **Exhibit C**.  
12 Good cause therefore exists for Plaintiff to supplement the record with *Maldonado*  
13 since these exact issues are present in this case. See Plaintiff's Opposition to  
14 Motion to Stay, ECF No. 27.

15 Plaintiff therefore requests that this Court grant Plaintiff leave to supplement  
16 the record with *Maldonado*, attached hereto as **Exhibit A**, and that this Court  
17 consider that case in its ruling on the pending Motion to Stay Discovery in this  
18 case. ECF No. 25.

19 DATED this 11th day of January 2017.

20  
21 **Kazerouni Law Group, APC**

22 By: /s/ Michael Kind

23 Michael Kind, Esq.

24 7854 W. Sahara Avenue

25 Las Vegas, NV 89117

26 *Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on January 11, 2017, the foregoing Plaintiff's Motion for Leave was served via CM/ECF to all parties appearing in this case.

**KAZEROUNI LAW GROUP, APC**

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